

Exhibit 1

1 UNITED STATES DISTRICT COURT
2 CENTRAL DISTRICT OF CALIFORNIA

3 JENNIFER BENTLEY,
4

5 Plaintiffs,

6 v.

7 UNITED OF OMAHA LIFE
8 INSURANCE CO.,

9 Defendants.
10

Case No.:CV 15-7870-DMG (AJWx)

11
12 **DECLARATION OF JOSEPH M. VANEK AS TO SERVICE OF NOTICE**

13 I, Joseph M. Vanek, hereby declare as follows:

14 1. I am a member of the bar of the State of Illinois and
15 Commonwealth of Massachusetts and have been admitted *pro hac vice* to this
16 Court. I am a partner of Sperling & Slater, P.C., counsel for plaintiff Jennifer
17 Bentley, as the trustee of the 2001 Bentley Family Trust and the certified direct
18 purchaser class in the above-captioned matter.

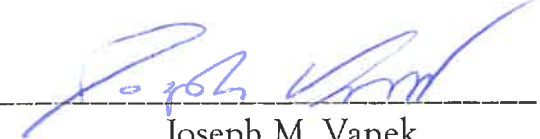
19 2. In order to ensure proper notice of the proposed settlement, I first
20 directed an effort to confirm that we possessed the correct contact information
21 for each of the members of the class. This effort began before the Court issued
22 its order preliminarily approving the settlement. To accomplish this, on
23 February 24, 2022 we sent letters (via first class mail) and emails to each of the
24 33 class members using both the beneficiaries last known addresses (as set forth
25 on Dkt. 179-1) and additional potential more recent addresses based on our
26 own research. The February 24, 2022 communication invited the beneficiaries
27 to call or email me to confirm their contact information. We then followed up
28 with additional letters to those class members with whom we had not

1 communicated on March 18, 2022. As of March 24, 2022, that effort resulted
2 in me speaking with and/or corresponding with 23 of the 33 class members.

3 3. Also on March 24, 2022 we sent the approved notice and the
4 Court's order preliminarily approving the settlement to all class members via
5 first class mail and email using the addresses which were confirmed via the
6 process outlined above, and to the last known addresses for the remaining 10
7 class members that had not confirmed their contact information.

8 4. To ensure that class counsel located as many class members as
9 possible, on April 11, 2022 we retained a private investigation firm to locate the
10 9 remaining class members that had not responded affirmatively to our previous
11 communications and with whom we had not affirmatively communicated with
12 via email or over the phone. The private investigation firm confirmed on April
13 27, 2022 that one of the class members is deceased, and provided potential
14 additional mailing addresses, phone numbers and email addresses for the
15 remaining 8 class members as well as for the one contingent beneficiary of the
16 deceased class member. Class counsel then sent supplemental notices via first
17 class mail and email to those remaining members, and also attempted to make
18 contact by phone. After these additional efforts to locate and communicate with
19 class members, as of May 15, 2022, class counsel have been in direct email
20 and/or phone communication with 29 of the 33 Class Members, leaving 4 class
21 members whose whereabouts could not be confirmed and with whom contact
22 could not be established.

23 Executed this 17th day of May, 2022.

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25 
26 Joseph M. Vanek
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